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14 *Attorneys for Plaintiffs*

15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA  
17 SAN JOSE DIVISION

18 IN RE SEAGATE TECHNOLOGY LLC  
LITIGATION

No. 3:16-cv-00523-JCS

19 DECLARATION OF STEVE W.  
20 BERMAN IN FURTHER SUPPORT OF  
21 PLAINTIFFS' MOTION FOR CLASS  
22 CERTIFICATION  
23  
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1 I, STEVE W. BERMAN, declare as follows:

2 1. I am the managing partner of the law firm Hagens Berman Sobol Shapiro LLP,  
3 attorneys for plaintiffs in the above-titled action. I have personal knowledge of the matters stated  
4 herein and, if called upon, I could and would competently testify thereto.

5 2. Plaintiffs have actively served the class thus far, including responding to multiple  
6 discovery requests, producing documents, and traveling multiple days to attend their depositions.

7 3. Attached hereto are true and correct copies of the following exhibits:

8 Exhibit 54: Document Bates-numbered FED SEAG0060976-82, produced in the above-  
9 captioned litigation and designated "HIGHLY CONFIDENTIAL" by  
Defendant Seagate pursuant to the protective order in this action;

10 Exhibit 55: Document Bates-numbered FED SEAG0004438-75-82 produced in the  
11 above-captioned litigation and designated "CONFIDENTIAL" by Defendant  
Seagate pursuant to the protective order in this action;

12 Exhibit 56; Document Bates-numbered FED SEAG0030293-331, produced in the  
13 above-captioned litigation and designated "CONFIDENTIAL" by Defendant  
Seagate pursuant to the protective order in this action; and

14 Exhibit 57; Document Bates-numbered FED SEAG0057277-403, produced in the  
15 above-captioned litigation and designated "HIGHLY CONFIDENTIAL" by  
Defendant Seagate pursuant to the protective order in this action.

16 I declare under penalty of perjury under the laws of the United States that the foregoing is  
17 true and correct. Executed this 20th day of February, 2018 at Seattle, Washington.  
18

19  
20 s/ Steve W. Berman  
STEVE W. BERMAN